

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: **RIGID BUILDING SYSTEMS, LTD.** **Debtor.** **§§§§§** **CASE NO. 10-41110**
CHAPTER 7

**STATEMENT IN SUPPORT OF MOTION OF CITIBANK, N.A. FOR RELIEF
FROM THE AUTOMATIC STAY WITH RESPECT TO SUBSTANTIALLY
ALL ASSETS OF THE DEBTOR'S ESTATE
(Relates to Docket No. 11)**

**TO THE HONORABLE KAREN K. BROWN,
UNITED STATES BANKRUPTCY JUDGE:**

Rigid Global Buildings LLC (“RGB”) files this Statement in Support of Motion of Citibank, N.A. for Relief from the Automatic Stay with Respect to Substantially All Assets of the Debtor’s Estate, and would respectfully show the Court the following:

1. On December 6, 2010 (the “Petition Date”), Dongkuk International, Inc. (“Dongkuk”) filed an involuntary petition under chapter 7 against the debtor, Rigid Building Systems, Ltd. (the “Debtor”). The Debtor is a Texas limited partnership. No trustee has been appointed, nor has the Debtor responded to the petition.

2. On December 12, 2010, Citibank, N.A. (“Citibank”) filed its Motion for Relief from the Automatic Stay with Respect to Substantially All Assets of the Debtor’s Estate (the “Motion”). Through the Motion, Citibank, a secured and judgment creditor of the Debtor with a perfected first priority security interest in all of the Debtor’s assets, seeks an order of this Court vacating the automatic stay to allow for the completion of the sale of the Debtor’s assets to RGB under a pre-petition sale agreement.¹

¹ Citibank filed a Supplement to the Motion on December 16, 2010. (Docket No. 15).

3. On December 20, 2010, the Debtor filed its Notice of No Opposition to the Motion of Citibank, N.A. for Relief from the Automatic Stay. (Docket No. 17). No creditor or party in interest has filed a pleading with the Court opposing the Motion.

4. RGB supports the relief requested in the Motion and stands ready, willing and able to close on the sale of the Debtor's assets upon the entry of an order vacating the stay by this Court.

DATED December 29, 2010.

Respectfully submitted,

MUNSCH HARDT KOPF & HARR, PC

By: /s/ Randall A. Rios

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ATTORNEYS FOR RIGID GLOBAL
BUILDINGS LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served via electronic means as listed on the ECF noticing system, on December 29, 2010.

/s/ Randall A. Rios
Randall A. Rios